



COLUMBIA | GREENVILLE

Bonnie D. Shealy

1901 MAIN STREET, SUITE 1200 POST OFFICE BOX 944

COLUMBIA, SOUTH CAROLINA 29202

(803) 779-8900 i (803) 227-1102 direct

FAX (803) 252-0724 | (803) 744-1551 direct

bsheaty@robinsonlaw.com

February 6, 2007

VIA ELECTRONIC FILING & HAND DELIVERED ORIGINAL

Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Universal Service Fund - 2007 Docket

Time Warner Telecom of South Carolina, LLC

Docket No. 1997-239-C

Dear Mr. Terreni:

Enclosed for filing please find Time Warner Telecom of South Carolina, LLC's petition to intervene in the above referenced docket. By copy of this letter we are serving the same on all interested parties. Please date stamp the extra copy of the petition and return it with our courier. Should you have any questions, please contact me.

Very truly yours,

Bonnie D. Shealy

/bds Enclosure

cc/enc:

Ms. Carolyn Marek, Vice President - Regulatory Affairs (via email)

Dan F. Arnett, Chief of Staff of ORS (via email & U.S. Mail)

All parties of record

THIS DOCUMENT IS AN EXACT DUPLICATE, WITH THE EXCEPTION
OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED
TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 1997-239-C

IN RE:)
Intrastate Universal Service Fund)) PETITION TO INTERVENE ON) BEHALF OF) TIME WARNER TELECOM) OF SOUTH CAROLINA, LLC)

Time Warner Telecom of South Carolina, L.L.C. ("Time Warner Telecom" or Petitioner") hereby petitions the Public Service Commission of South Carolina ("Commission") pursuant to S.C. Code Section 58-9-280, 26 S.C. Regs. 103-836 and other applicable rules and regulations for permission to intervene in the above captioned proceeding. In support of this petition, Time Warner Telecom would show the following:

- Time Warner Telecom is authorized to provide competitive local exchange and interexchange telecommunications services in South Carolina pursuant to the Commission's Order Nos. 2001-93 and 2005-77.
- Time Warner Telecom's authorized representatives in this proceeding are as follows:

LEGAL REPRESENTATIVES

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
Columbia, South Carolina 29202
Telephone: 803-779-8900
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

and

COMPANY REPRESENTATIVE

Carolyn Ridley
Time Warner Telecom
233 Bramerton Court
Franklin, Tennessee 37069
Telephone: 803-376-6404
Carolyn.ridley@twtelecom.com

- The Commission has scheduled a hearing to address proposed modifications to the Guidelines for the South Carolina Universal Service Fund for April 19, 2007.
- 4. Time Warner Telecom has an interest in the Universal Service Fund proceeding since Time Warner Telecom provides telecommunications services in South Carolina and is required to contribute in the state universal service fund. Therefore, it has a substantial interest in this docket.
- 5. Time Warner Telecom seeks to participate in the development of modifications to the Guidelines and will advocate its position with respect to those issues presented during this proceeding.

- 6. Time Warner Telecom requests permission to intervene in the above-captioned proceeding as a formal party of record. Time Warner Telecom requests that the Commission permit it to intervene out of time in this proceeding since Time Warner Telecom was not an organized entity at the time for intervening which elapsed several years ago. At this time, Time Warner Telecom is unable to access the length of time that it may require to make its presentation to the Commission, but does not anticipate that it will exceed one hour.
- 7. Time Warner Telecom's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding. Time Warner Telecom's position in this matter is that the Guidelines should operate on a competitively neutral basis.
- 6. Time Warner Telecom is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing the views and concerns of Time Warner Telecom can be developed.

WHEREFORE, TIME WARNER TELECOM prays for the following relief:

- A. That this petition to intervene be granted by the Commission and that the Time Warner Telecom be made a formal party of record to the proceeding.
- B. That Time Warner Telecom be allowed to participate fully in this proceeding and to take such positions as it deems advisable.
 - C. That such other and further relief be granted as is just and proper.

ROBINSON, McFADDEN & MOORE, P.C.

Frank R. Ellerbe, III
Bonnie D. Shealy
Post Office Box 944
Columbia, SC 29202
Telephone (803) 779-8900
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

Counsel for Time Warner Telecom of South Carolina, L.L.C.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 1997-239-C

IN RE:)
Intrastate Universal Service Fund)
madate officeral corridor and)
)
)

CERTIFICATE OF SERVICE

This is to certify that I, Vickie V. Pietschker, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Time Warner Telecom of South Carolina**, **LLC's Petition to Intervene** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Robert D. Coble, Esquire Nexsen Pruet, LLC PO Drawer 2426 Columbia, SC 29202

Gene V. Coker, Esquire AT&T - Law & Government Affairs Suite 8100 1200 Peachtree Street, NE Atlanta, GA 30309

Patrick W. Turner, Esquire BellSouth Telecommunications, Inc., Post Office Box 752 Columbia, SC 29202

Robert E. Tyson, Jr., Esquire Sowell Gray Stepp & Laffitte, LLC Post Office Box 11449 Columbia, SC 29211 Faye A. Flowers, Esquire Parker, Poe, Adams & Bernstein, LLP Post Office Box 1509 Columbia, SC 29202

Darra W. Cothran, Esquire Woodward, Cothran & Herndon P.O. Box 12399 Columbia, SC 29211

John J. Pringle, Jr., Esquire Ellis, Lawhorne & Sims, P.A. Post Office Box 2285 Columbia, SC 29202

Florence P. Belser, General Counsel Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211

Nanette S. Edwards, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, SC 29211

Craig K. Davis, Esquire 1420 Hagood Avenue Columbia, SC 29205-1327

John F. Beach, Esquire Ellis, Lawhorne & Sims, P.A. P.O. Box 2285 Columbia, SC 29202

M. John Bowen, Jr., Esquire McNair Law Firm, P.A. P.O. Box 11390 Columbia, SC 29211

Margaret M. Fox, Esquire McNair Law Firm, P.A. P.O. Box 11390 Columbia, SC 29211

Ross Allen Buntrock, Esquire Womble Carlyle Sandridge & Rice, PLLC 1401 Eye Street, 17th Floor Washington, DC 20005 Lori Reese Patton, Esquire Womble Carlyle Sandridge & Rice, PLLC One Wachovia Center, Suite 3500 301 S. College Street Charlotte, NC 28202

Scott A. Elliott, Esquire Elliott & Elliott 721 Olive Street Columbia, SC 29205

Steven W. Hamm, Esquire Richardson Plowden Carpenter & Robinson, PA 1900 Barnwell Street P.O. Drawer 7788 Columbia, SC 29202-7788

John M.S. Hoefer, Esquire Willoughby & Hoefer, P.A. 1022 Calhoun Street, Suite 320 Post Office Box 8416 Columbia, SC 29202

Benjamin P. Mustian, Esquire Willoughby & Hoefer, P.A. Post Office Box 8416 Columbia, SC 29202-8416

Susan B. Berkowitz, Esquire SC Appleseed Legal Justice Center Post Office Box 7187 Columbia, SC 29202

Dated at Columbia, South Carolina this 6th day of February, 2007.

Vickie V. Pietschker